

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA	:	CASE NO: 3:24cr065
Plaintiff	:	Judge Michael J. Newman
-VS-	:	
CHRISTOPHER JEWETT	:	
Defendant	:	

MEMORANDUM IN SUPPORT OF COURT'S
ACCEPTANCE OF 11(c)(1)(C) PLEA AGREEMENT

Comes now the Defendant and sets forth the reasons this court should accept the plea agreement tendered pursuant to Federal Rules of Criminal Procedure, Rule 11(c)(1)(C), and impose a sentence of 300 months on each count, concurrent.

The court's discretion is controlled in part by 18 U.S.C. §3553, et seq in that the court “**shall** impose a sentence sufficient, but not greater than necessary, to comply with the purposes set forth in paragraph (2) of this subsection”. 18 U.S.C. §3553 (a)(Emphasis added).

The purposes set forth in paragraph (2) of the subsection are: “(2) the need for the sentence imposed—(A) to reflect the seriousness of the offense, to promote respect for the law, and to provide just punishment for the offense; (B) to afford adequate deterrence to criminal conduct; (C) to protect the public from further crimes of the defendant; and (D) to provide the defendant with needed educational or vocational training, medical care, or other correctional treatment in the most effective manner.” 18 U.S.C. §3553(a)(2)(A)-(D).

Imposing the agreed upon sentence of 300 months, on each count, concurrent, entered pursuant to Federal Rules of Criminal Procedure, Rule 11(c)(1)(C) satisfies the paragraph 2 principles and purposes of sentencing:

1) A twenty-five year sentence reflects the seriousness of the offense, promotes respect for the law and provides just punishment for the offense. The twenty-five year sentence is being imposed on the Defendant who is 27 years old. The period of incarceration agreed to by the parties, mirrors Defendant's entire time on earth. He will not be released from prison until he is more than fifty years old. The twenty-five year sentence is a sentence that reflects the seriousness of the offense, promotes respect for the law, provides just punishment for the offense and affords adequate deterrence to criminal conduct;

2) The twenty-five year sentence protects the public from further crimes of the defendant as noted by the father of victim A: "Jewett is going to be spending time in prison and will not be able to hurt anyone else." (ECF No. 34 PAGEID# 159);

3) The twenty-five years will enable Defendant to benefit from Sex Offender Treatment Programs offered by the Bureau of Prisons. (See attached). Defendant asks the court to recommend in its Judgment of Conviction that the Defendant be placed in FCI Elkton a Sex Offender Management Program (SOMP) which have a larger sex offender population and offer treatment programs to the unique sex offender population.

In addition to the agreement of the parties, the 11(c)(1)(C) is the sentence recommended to this court by the probation officer who authored the pre-sentence investigation report. The recommendation of the authoring probation officer is based on her training and experience and assures the court that the agreed-upon sentence avoids unwarranted sentence disparities among

defendants with similar records who have been found guilty of similar conduct. See, 18 U.S.C. §3553 (a)(6).

In addition to the actual prison term agreed to by and between the parties, the ten-year period of supervised release (recommended by the PSR writer), permits the court to maintain supervision of this Defendant into his sixties and if the terms of supervised release are violated an additional period of incarceration.

For all the foregoing reasons, Defendant prays the court impose the sentence agreed to between the parties, recommend placement at FCI Elkton and recommend that regardless of the placement, that the Defendant receive any and all Sex Offender Treatment available to the Defendant by the Bureau of Prisons in addition to all other mental health treatment the Bureau of Prisons can offer this Defendant.

Respectfully submitted:

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Memorandum was served on all attorneys of record by filing same on the court's CM/ECF system this 25th day of March, 2025.

S/:Lawrence J. Greger